



Attorneys:
Brian M. Levine Esq.+
Manijt Singh, Esq.+

Rosanna Ruotolo Esq.+**
Andrew V. Poznanski, Esq.+*

+ Admitted in NY
^ Admitted in NJ
* Of Counsel

March 28, 2024

Via ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, New York 11722

Re: Superb Motors, et. al. v. Deo, et. al.
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

We represent the Deo Defendants in the within matter and respectfully submit this letter in opposition to the plaintiffs' request for leave to exceed the page length restrictions prescribed by this Court.

It is important to note that the plaintiffs are comprised of two distinct groups, represented by three different law firms, with minimal overlap in the claims they have filed. Despite their decision to jointly initiate this action, the plaintiffs now seek to leverage this collective approach as a sword to justify an exemption—a strategy that has already unfairly burdened the Deo Defendants by limiting the arguments that could be raised in their motion papers.

The Deo Defendants were constrained to twenty-five pages to address the “dozens of claims” presented by both groups of plaintiffs. This limitation was strictly adhered to, despite the complexity and volume of the issues at hand. It is, therefore, unreasonable for the plaintiffs to claim an inability to articulate their opposition within the same constraints, especially considering that all the other moving defendants have successfully submitted their legal memoranda within a more concise thirteen-page limit.

There is simply no reason why plaintiffs cannot oppose the four motions with four separate Memorandums of Law within the limitations set by this Court. In fact, since each of the motions pertain to different claims for different defendants, combining opposition to all four motions in an omnibus opposition would do nothing but obfuscate the issues before this Court, and would make any reply overly laborious.



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Given these considerations, we urge the Court to deny the plaintiffs' application, and compel the plaintiffs to file opposition to each motion within the limits set by the Court.

Respectfully,

s/ Brian M. Levine
Brian M. Levine

VIA ECF
All Parties